

**Submission received via email from anonymous submitter previously engaged in domain names - April 1**

I am concerned at the proposal to remove the one month registration ability.

"One disadvantage is: • Impact on existing registrars using monthly renewals"

Yes, & I'll leave them to list what these might be, but I am worried by the suggestion "a small number of purely domain-focused registrars have used this as a point of difference" this suggests that registrars for whom domain registration is their core business are seen as somehow inferior to registrars who register an occasional domain name as part of a different business.

Another disadvantage you do not seem to cover is the effect on registrants who used to be seen as central to the system. Has any investigation been done on why registrants choose to use monthly renewals? Some people use it to smooth their costs over the course of the year. I also can see people offering domain name management as part of a larger service that is billed monthly wanting to standardise their monthly bill to clients. I know that when I investigated doing this several years back being able to offer a single fixed monthly charge for registration, hosting, security updates, etc was of interest to my prospective customers.

If you do move from monthly renewals to annual, how do you intend phasing these in so registrants with multiple domains won't be hit with a large annual bill in the same month for all their domain names.

Considering some of your other points:

"Easier for most registrars to understand and implement"

Registrars are not required to implement monthly renewal & by your figures 96% don't.

"International registrars' understanding of our 1 month auto renewal terms can diminish between initially connecting to our registry and improving or revising their systems."

As can their understanding of any other part of our system, and, of course, they are not required to implement monthly renewal.

They seem to cope well with monthly billing for hosting & other non-registry services.

"Simplifying the billing term and frequency reduces the complexity required for the registry billing system."

Really? I would have assumed the registry billing system would be computerised & a large number of businesses manage to bill on a monthly basis.

"A simplified billing system reduces the support overhead and the effort required for testing, troubleshooting issues and reconciliation."

Huh? Are there any facts to support this claim? It seems at odds to what I learned during over 40 years developing, among other things, computerised accounting software